

Ethane, 1,2 dibromo- - Comments of Environmental Defense

(Submitted via Internet 7/2/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Ethane, 1,2 dibromo- (EDB, also known as ethylene dibromide) (CAS # 106-93-4).

The test plans and robust summaries for ethylene dibromide (EDB) were prepared by Great Lakes Chemical Corporation. No information on uses of EDB was presented although it is well known that it is a pesticide used as a grain fumigant and for other applications. Data presented in the robust summaries are consistent with the knowledge that EDB is a mutagen, carcinogen and reproductive toxicant. Numerous studies have been conducted on EDB in a variety of biological systems. These studies include epidemiology investigations in the workplace, studies in animals and on the mechanism of action. The finding that EDB can cause a dramatic drop in sperm counts in workers has focused many studies on the reproductive effects of this chemical.

The available information on EDB exceeds the requirements of the HPV Challenge Program so we concur with the sponsor that no additional studies are needed at this time.

Thank you for this opportunity to comment.

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